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March 19, 2021

By ECF/EmailThe Honorable Katherine Polk Failla
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007MATTHEW W. ABBOTT
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T. ROBERT ZOCHOWSKI, JR.*NOT ADMITTED TO THE NEW YORK BAR
**ADMITTED ONLY TO THE CALIFORNIA BAR*United States v. Anilesh Ahuja, 18 Cr. 328 (KPF)*

Dear Judge Failla:

On behalf of Mr. Ahuja and Mr. Shor, we write to respectfully request an extension of the date to file post-trial motions, currently due on March 26, 2021. We have been working diligently to prepare our briefs on the schedule set by the Court but unfortunately it is taking longer than anticipated. The record on which these motions are based is extensive, and spans the period from indictment in 2018 through the government's post-trial disclosures from the spring of 2020 through February 2021. In addition, for the sake of efficiency, we are coordinating with counsel for Mr. Shor in an effort to file a joint brief addressing issues common to both defendants, and that process also requires additional time.

We propose the following modified briefing schedule:

- Defense briefs due Friday, April 16, 2021;

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- Government opposition due Friday, May 7, 2021; and
- Defense replies due by Friday, May 28, 2021.

This is the defendants' first request for an extension of time to file post-trial motions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Roberto Finzi".

Roberto Finzi

Richard C. Tarlowe

cc: Counsel of Record